## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	) ) CHAPTER 11
FIELDWOOD ENERGY LLC, et al.,1	) CASE NO. 20-33948 (MI)
DEBTORS.	) JOINTLY ADMINISTERED )

## NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND SERVICE

PLEASE TAKE NOTICE that the undersigned, Michael E. Collins, and the firm of Manier & Herod, P.C. are making their appearance on behalf of Philadelphia Indemnity Insurance Company, a creditor and party in interest in this proceeding, and, in accordance with Rules 2002, 3017(a), and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and 11 U.S.C. §§ 342 and 1109(b), request that copies of all notices, pleadings, orders and other papers in this case be served on the following person at the following address:

Michael E. Collins, Esq. MANIER & HEROD, P.C. 1201 Demonbreun St., Suite 900 Nashville, TN 37219 Telephone: (615) 742-9350

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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules and Bankruptcy Code sections specified above, but also

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

includes, without limitation, any and all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, courier service, hand-delivery, telephone, facsimile transmission, or otherwise pertaining in any manner to the above-referenced cases or the proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notices shall not be deemed or construed to be a waiver of the rights of the undersigned party appearing through counsel: (1) to have final orders in non-core matters and *Stern* claims entered only after *de novo* review by a United States District Court Judge; (2) to trial by jury in any proceeding so triable in these cases, controversies, or proceeding related to these cases; (3) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (4) to have its claims or other rights adjudicated pursuant to any rights of arbitration; or (5) to any other rights, claims, actions, setoffs, or recoupments to which it is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions defenses, setoffs, and recoupments are hereby expressly reserved. All of the above rights are expressly reserved and preserved unto Philadelphia Indemnity Insurance Company, without exception, and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Respectfully submitted,

MANIER & HEROD, P.C.

/s/ Michael E. Collins

Michael E. Collins (TX Bar No. 24029006) Robert W. Miller (*pro hac vice* forthcoming)

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, and served upon all parties receiving notice pursuant to the CM/ECF system on this the 5<sup>th</sup> day of August, 2020.

/s/ Michael E. Collins

Michael E. Collins